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*Attorney for Movant*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

KALMAN ISAACS, Individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

TESLA, INC. and ELON R. MUSK,

Defendants.

Case No.: 3:18-cv-04865-EMC

**DECLARATION OF JENNIFER  
PAFITI IN SUPPORT OF MOTION  
OF THE TESLA INVESTOR GROUP  
FOR CONSOLIDATION OF  
RELATED ACTIONS,  
APPOINTMENT AS LEAD  
PLAINTIFF AND APPROVAL OF  
COUNSEL**

CLASS ACTION

JUDGE: Hon. Edward M. Chen  
Hearing Date: November 15, 2018  
Time: 1:30 p.m.  
Ctrm: #5, 17<sup>th</sup> Floor (San Francisco)

WILLIAM CHAMBERLAIN, Individually  
and on behalf of all others similarly situated,

Plaintiff,

v.

TESLA, INC. and ELON R. MUSK,

Defendants.

Case No.: 3:18-cv-04876-EMC

1 2 3 4 5 6	JOHN YEAGER, Individually and on behalf of all others similarly situated,  Plaintiff,  v.  TESLA, INC. and ELON R. MUSK,  Defendants.	Case No.: 3:18-cv-04912-EMC
7 8 9 10 11 12	CARLOS MAIA, Individually and on behalf of all others similarly situated,  Plaintiff,  v.  TESLA, INC. and ELON R. MUSK,  Defendants.	Case No.: 3:18-cv-04939-EMC
13 14 15 16 17 18	KEWAL DUA, Individually and on behalf of all others similarly situated,  Plaintiff,  v.  TESLA, INC. and ELON R. MUSK,  Defendants.	Case No.: 3:18-cv-04948-EMC
19 20 21 22 23 24	JOSHUA HORWITZ, Individually and on behalf of all others similarly situated,  Plaintiff,  v.  TESLA, INC. and ELON R. MUSK,  Defendants.	Case No.: 3:18-cv-05258-EMC

1 2 3 4 5 6	ANDREW E. LEFT, Individually and on behalf of all others similarly situated,  Plaintiff,  v.  TESLA, INC. and ELON R. MUSK,  Defendants.	Case No.: 3:18-cv-05463-EMC
7 8 9 10 11 12	ZHI XING FAN, Individually and on behalf of all others similarly situated,  Plaintiff,  v.  TESLA, INC. and ELON R. MUSK,  Defendants.	Case No. 3:18-cv-05470

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15 I, Jennifer Pafiti, hereby declare as follows:

16 1. I am a partner with the law firm of Pomerantz LLP (“Pomerantz”), counsel on behalf of  
17 Donald Freeland, Alvin Abrams, Christopher Lyman, and Rajinder Gaur (collectively, the “Tesla  
18 Investor Group”), and have personal knowledge of the facts set forth herein. I make this Declaration in  
19 support of the Tesla Investor Group’s motion for consolidation of the above-captioned related actions  
20 (the “Related Actions”), appointment as Lead Plaintiff for the Class and approval of the Tesla Investor  
21 Group’s selection of Pomerantz as Lead Counsel for the Class.

22 2. Attached hereto as the exhibits indicated are true and correct copies of the following:

23 Exhibit A: Press release published over *Globe Newswire* on August 10, 2018,  
24 announcing the pendency of the first of the Related Actions to be filed;

25 Exhibit B: Shareholder Certifications executed by the members of Tesla Investor  
26 Group;

27 Exhibit C: Loss Chart of the Tesla Investor Group; and

28 Exhibit D: Firm resume of Pomerantz.

1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing facts are true and correct.

3 Executed on October 9, 2018, at New York, New York.

4  
5 /s/ Jennifer Pafiti  
6 Jennifer Pafiti  
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CERTIFICATE OF SERVICE

I hereby certify that on October 8, 2018, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/Jennifer Pafiti  
Jennifer Pafiti